

1 RICHARD A. WRIGHT, ESQUIRE
Nevada Bar No. 886
2 RUSSELL E. MARSH, ESQUIRE
Nevada Bar No. 11198
3 SUNETHRA MURALIDHARA, ESQUIRE
Nevada Bar 13549
4 WRIGHT MARSH & LEVY
300 S. Fourth Street
5 Suite 701
Las Vegas, NV 89101
6 Office: (702) 382-4004
Fax: (702) 382-4800
7 rick@wmllawlv.com
russ@wmllawlv.com
8 smuralidhara@wmllawlv.com
Attorneys for Defendant LANCE K. BRADFORD
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10 UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA
12

13 UNITED STATES OF AMERICA,)
14 Plaintiff,) Case No. 2:19-CR-00222-GMN-BNW
15 vs.) **STIPULATION AND ORDER TO EXTEND**
16 LANCE K. BRADFORD,) **TIME TO FILE OBJECTIONS AND RESPONSE**
17 Defendant.) **ON REPORT AND RECOMMENDATION**
18)

19 IT IS HEREBY STIPULATED and agreed, by and between, LANCE K. BRADFORD,
20 Defendant, by and through his counsel, RICHARD A. WRIGHT, ESQUIRE, RUSSELL E. MARSH,
21 ESQUIRE, and SUNETHRA MURALIDHARA, ESQUIRE, WRIGHT MARSH & LEVY, and
22 JASON M. FRIERSON, United States Attorney, by STEVEN W. MYHRE, Assistant United States
23 Attorney, and J. PATRICK BURNS, Trial Attorney, United States Department of Justice, that the
24 parties' deadlines for filing objections to the Report and Recommendation dated April 18, 2023
25 (ECF 149), and responses thereto, be extended for one week each, as set forth herein.

26 This stipulation is entered into for the following reasons:

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1 1. On March 30, 2022, Mr. Bradford filed a motion to suppress and request for a *Franks*
2 hearing. (ECF 83.) Magistrate Judge Weksler set this motion for an evidentiary hearing, and
3 testimony was heard on June 14-15, 2022, and July 29, 2022. (ECF 108, 109, 128.)

4 2. Following the evidentiary hearing, Judge Weksler set a post-hearing briefing schedule
5 on the motion. (ECF 128.) Mr. Bradford filed his brief on September 30, 2022; the government
6 filed its response on October 31, 2022; and the reply was filed on November 14, 2022. (ECF 133,
7 137, 139.)

8 3. On February 24, 2023, the parties filed a Stipulation to Continue Trial, which was
9 granted. (ECF 147, 148.) The current trial date is September 11, 2023. (ECF 148.)

10 4. On April 18, 2023, Judge Weksler filed her Report and Recommendation, denying
11 the motion to suppress. (ECF 149.) The Report and Recommendation was served on the parties
12 through the CM/ECF system on April 19, 2023. *Id.*

13 5. Under the local rules, the deadline for filing objections to a magistrate judge's
14 findings and recommendations is 14 days after service of the report and recommendation. LR IR 3-
15 2. Thus, although the Minute Order suggests otherwise (ECF 149), any objections are due by May
16 3, 2023. Any responses would be due 14 days after service of the objections. LR IR 3-2.

17 6. The parties agree that due to the complexity of the issues raised, as well as the
18 extensive briefing and record on this motion, the parties should have 21 days to file objections, and
19 21 days after that to file responses to the objections.

20 7. In addition, Mr. Marsh, one of the attorneys for Mr. Bradford, was out of the country
21 on a pre-planned family trip from April 20-26, 2023.

22 8. Under the agreed schedule, any objections are due by May 10, 2023; and any
23 responses thereto would need to be filed by May 31, 2023.

24 9. This extension of the schedule should not affect the current trial date, as objections
25 and responses would be filed more than 3 months before the trial date of September 11, 2023.

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WHEREFORE, the United States of America, and the Defendant, Lance Bradford, jointly request that the parties be given an extension of one week each to file their objections and responses on the Report and Recommendation on Mr. Bradford's motion to suppress.

Dated this 1st day of May, 2023.

WRIGHT MARSH & LEVY

JASON M. FRIERSON
United States Attorney

By /s/ Russell E. Marsh
RICHARD A. WRIGHT, ESQUIRE
RUSSELL E. MARSH, ESQUIRE
SUNETHRA MURALIDHARA, ESQUIRE
300 S. Fourth Street
Suite 701
Las Vegas, NV 89101
Counsel for Defendant Bradford

By /s/ Steven W. Myhre
STEVEN W. MYHRE
Assistant U.S. Attorney
501 Las Vegas Boulevard South
Suite 1100
Las Vegas, NV 89101

By /s/ J. Patrick Burns
J. Patrick Burns
Trial Attorney
Tax Division
U.S. Department of Justice

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
LANCE K. BRADFORD,
Defendant.

Case No. 2:19-CR-00222-GMN-BNW

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court and hereby extends the deadline for the parties to file objections and responses on the Report and Recommendation served on April 19, 2023 (ECF 149), as follows: (1) the parties shall file any objections on or before May 10, 2023; and (2) responses to any objections shall be filed by May 31, 2023.

Dated: May 1, 2023



GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE